

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

United States of America,

Plaintiff,

-vs-

Rhawnie Marcellais,

Defendant.

**MOTION TO MODIFY CONDITIONS
OF RELEASE**

Case No. 3:23-CR-00033

¶ 1. On behalf of Defendant, Rhawnie Marcellais, by her attorneys, Sand Law, PLLC:

¶ 2. Motion:

- a. Defendant hereby moves this Court to modify the currently in place Conditions of Release to permit Defendant to have contact with her daughter, C.M., and son, Z.M.

¶ 3. Case History and facts:

- a. The Jury Trial in this matter has now concluded. Any concerns regarding potential witness tampering are now moot.
- b. The Government has indicated they are opposed to such modification.

¶ 4. CONCLUSION:

- a. On this basis, Counsel for Defendant humbly request that this Court hold a Hearing on the matter and permit Defendant to have contact with her daughter, C.M., and son, Z.M.

Dated: 6/28/2024

SAND LAW, PLLC
Counsel for Defendant

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